

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
WESTERN DIVISION**

KELLYANN M. GOODMAN

PLAINTIFF

vs.

CASE NO. 4:14-cv-00504-JLH

PORTFOLIO RECOVERY ASSOCIATES, LLC

DEFENDANT

MOTION TO ENFORCE SETTLEMENT AGREEMENT

Comes now Plaintiff Kellyann M. Goodman and for her Motion to Enforce Settlement Agreement states and alleges:

1. That the parties agreed to the confidential settlement of Plaintiff's claims herein on or before October 9, 2014.
2. That Plaintiff tendered her executed Release and Settlement Agreement to Defendant on October 25, 2014.
3. That despite repeated demands; Defendant has failed to execute its Release and Settlement Agreement and tender settlement funds.
4. Plaintiff moves the Court to compel Defendant to execute its Release and Settlement Agreement and the immediate tender of settlement funds.
5. Plaintiff moves for her costs and attorney's fees in filing this motion.

Date: November 11, 2014

Respectfully submitted,

By: /s/ J.R. Andrews
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, J.R. Andrews, hereby certify that on November 11, 2014, I electronically filed the foregoing pleading with the Clerk of the Court via the electronic filing system which shall send notification to all attorneys of record.

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/s/ J.R. Andrews
J.R. Andrews, Esq.